



## CO2 regulation as a pollutant

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To: Environmental Protection Agency

RE: Docket ID No. EPA-HQ-OAR-2009-0171

Dear Sirs:

My name is Jonathan Ford. I am the Managing Director of Environmental Services at Montana State University – Bozeman. In this capacity, I am in charge of collecting and compiling data for the National Weather Service COOP weather station 24-1044 that resides on campus. I am also a former pilot, and consequently, I am extremely interested in the weather, climate and the global warming debate. While not having a technical background in climatology, atmospheric science and related areas pertaining to the subject, I have done a great deal of research in this area on my own and consider myself better informed than most legislators, the media, and the public in general. The following opinions are my own and do not represent Montana State University-Bozeman in any way.

I do not believe that there is scientific consensus on the subject of human-caused global warming, and that the role of CO2 as the primary driver of the gradual warming of the earth since the Little Ice Age is incorrect. CO2 is a trace atmospheric gas that is ten times less powerful a greenhouse gas than is water vapor. Water vapor is integral to the formation of clouds, clouds reflect solar radiation back into space, and the climate models upon which the bulk of the global warming argument rests do not model clouds well at all. We do not yet understand the cloud system. CO2 has been as high as 1000 ppm in the earth's past without runaway global warming; there are times in the earth's history when the CO2 has been that high and the climate has cooled. Most recently, the earth cooled from the late 1940's to the late 1970's during a period when the amount of CO2 produced by man was growing rapidly. The possibility of a delayed effect from this CO2 increase causing the warming of the last thirty years is negated by the global cooling of the last 8.5 years in the face of even faster human CO2 production. In any case, the survey of reporting weather stations in the United States conducted by Anthony Watts has shown that the majority of them do not conform to the National Weather Service's own site selection and installation standards. What has been considered the gold standard in surface temperature records, upon which the bulk of the anthropogenic global

warming argument is based, is data that has a bias that indicates much more warming than has actually occurred by several degrees.

CO2 cannot be regulated as a pollutant. It is essential for nearly all the life on earth, which takes in and expels the gas on many levels. Beer and sodas release CO2. Greenhouses regularly artificially increase the CO2 concentration in their polyhouses to thousands of parts per million because it increases plant production. People and animals exhale CO2. To regulate this important gas is ludicrous and represents a misguided government effort to punish carbon-based energy producers and reward alternative, clean energy producers. The problem is, the alternative energy sources are intermittent and exponentially expensive compared to carbon-based energy sources, and there is no realistic technology or price break for the alternatives in sight. The cap and trade approach will make the traditional energy producers pay millions to the government, and this will result in increased costs of energy, all passed on to the consumer. All costs will go up, productivity will go down, and the economic engine that has propped up the world for decades will be destroyed. Meanwhile, China will go ahead producing coal-fired power plants at breakneck speed, and with their resulting cheap energy and a billion people, will ascend to world economic supremacy.

Please, for the sake of this country: do not embark on regulating CO2 as a pollutant!

Thank you for the opportunity to comment on this initiative.

**Jonathan L. Ford**

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